

10250 Constellation Blvd., Suite 1100
Los Angeles, California 90067
Tel: +1.424.653.5500 Fax: +1.424.653.5501
www.lw.com

LATHAM & WATKINS LLP

FIRM / AFFILIATE OFFICES

Beijing	Moscow
Boston	Munich
Brussels	New York
Century City	Orange County
Chicago	Paris
Dubai	Riyadh
Düsseldorf	San Diego
Frankfurt	San Francisco
Hamburg	Seoul
Hong Kong	Shanghai
Houston	Silicon Valley
London	Singapore
Los Angeles	Tokyo
Madrid	Washington, D.C.
Milan	

February 21, 2020

VIA ECF

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Jane Doe, et al. v. The Trump Corporation, et al., 18-cv-09936 (LGS)

Dear Judge Schofield:

We write on behalf of nonparties JMBP, LLC (“JMBP”) and Metro-Goldwyn-Mayer Studios Inc. (“MGM”), pursuant to Rule I.D.3 of Your Honor’s Individual Rules and Procedures for Civil Cases (the “Individual Rules”), to respectfully request provisional approval to file under seal certain exhibits attached to the declaration of Jessica Stebbins Bina, submitted in support of JMBP and MGM’s opposition to plaintiffs’ motion to compel.

JMBP and MGM have provisionally filed the documents under seal and have filed provisionally redacted versions of the same on the public docket. In accordance with this Court’s February 10, 2020 Order, JMBP and MGM will file a consolidated letter by March 3, 2020, explaining why certain information in plaintiffs’ motion to compel, JMBP and MGM’s opposition, and plaintiffs’ reply should remain redacted or sealed.

Best regards,



Jessica Stebbins Bina (*admitted pro hac vice*)
of LATHAM & WATKINS LLP

cc: All counsel of record (via ECF)